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Inventorship Bloch
5 Assignee Microsoft
Group Art Unit..... 2697
Examiner M. Demicco
Attorney's Docket No. MS1-1073US
10 Title: Seamless playback of multiple clips of media data across a data
network

APPEAL BRIEF TO THE BOARD OF PATENT APPEALS AND
INTERFERENCES OF THE UNITED STATES PATENT OFFICE

To: Commissioner for Patents
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Appellant's Opening Brief on Appeal

This opening brief is presented in support of the Notice of Appeal filed on
July 7, 2004 from the final rejection of claims 1-19 of the above identified
application. The Final Office Action which Appellant hereby appeals was
25 mailed April 7, 2004.

The Appeal Brief is filed in triplicate. A check or deposit account form for
the amount of \$ 330.00 is enclosed for the requisite fee set forth in 37 C.F.R. §
1.17(c). Please charge any additional required fees or credit overpayment to
Deposit Account 120769. Appellant respectfully requests reversal of the
30 Office's rejection of pending claims 1-19.

Table of Contents

	Real Party in Interest	3
	Related Appeals and Interferences	3
5	Status of the Claims	3
	Status of the Amendments	3
	Summary of the Invention	3
	Issues Presented for Review	6
	Grouping of the Claims	6
10	Argument	7
	Conclusion	16
	Appendix: Current Pending Claims	17

Real Party in Interest

The present application has been assigned to Microsoft Corporation, a corporation organized and existing under and by virtue of the laws of the State of Washington and having an office and place of business at One Microsoft
5 Way, Redmond, Washington 98052, in an assignment filed for recordation filed on August 29, 2002 with the USPTO. Therefore, the real party in interest is Microsoft Corporation.

Related Appeals and Interferences

10 There are no other appeals or interferences known to Appellant/Applicant which will have a bearing on the Board's decision in the present appeal.

Status of the Claims

15 Nineteen claims are pending in this application. The Office has rejected claims 1-19. These claims are the subject of the present appeal.

Status of the Amendments

In an Office Action mailed August 12, 2003, the Office rejected claims 1-
20 19. A Response dated January 9, 2004 amended claim 7 to correct an omission and amended claim 11 to correct a typographical error.

In a Final Office Action mailed April 7, 2004, the Office rejected claims 1-19. A Notice of Appeal was filed July 7, 2004. The pending claims listed in the Appendix reflect the current claims 1-19.

25

Summary of the Invention

In the 1990s, a "server push" model was in use to achieve a constant data rate for playback of media accessed media via a network (Specification at page 1, line 17 to page 2, line 9). However, the server push model had
30 drawbacks. For example, the playback logic was quite simple (e.g., limited to

commands such as “play”, “stop” or “fast-forward”) and it resided in the server. As a result, a user was unable to specify a particular frame or frames to be played; thus, the server push model did not provide support for frame-accurate transport of media data across a network (Specification at page 2, lines 11-20).

5 Given the state-of-the-art, the inventors recognized a need for a system and method of frame-accurate transport of media data across a network that would allow for seamless playback of multiple media clips (Specification at page 2, line 18 to page 3, line 3). The present invention meets this need.

10 In particular, the present invention is directed to a “client pull” data transport model (Specification at page 4, lines 7-9). The client pull model translates a playlist into a plurality of frame accurate requests, which are sent from the client to servers one request at a time. The server, upon receiving the frame accurate requests, retrieve the corresponding frames of media data and transmit the frames back to the client. The client begins to render the
15 requested frames upon receiving them from the servers where the rendering and retrieval of the frames occur as close to real-time as possible. Accordingly, transport control within the client allows for easy control of playback timing of the last frame of a first clip and the first frame of a second clip. For example, such a client may schedule the playback of the last frame of the first clip and
20 the first frame of the second clip such that the playback of the clips appears seamless (Specification at page 4, lines 11-23).

 Independent claims 1, 7 and 14 are directed to a method, a system and computer readable medium, that generally aim to access a playlist that specifies a first clip and a second clip to be played where the first clip is stored
25 within a first source and the second clip is stored within a second source; to translate the playlist into a first plurality of frame accurate requests that specify first respective frames of the first clip and a second plurality of frame accurate requests that specify second respective frames of the second clip; to transmit the first plurality of frame accurate requests over the data network to the first
30 source and to transmit the second plurality of frame accurate requests over the

data network to the second source; to receive the first respective frames from the first source; to render the first respective frames at a predetermined framerate; to receive a first frame of the second respective frames from the second source before a last frame of said first respective frames is rendered;
5 and to render the first frame of the second respective frames after the last frame at the predetermined framerate such that playback of the first clip and the second clip appears seamless.

The instant application is a continuation-in-part of United States Patent Application Serial Number 08/733,478, filed October 18, 1996, entitled "A High-
10 Performance Player for Distributed, Time-based Media," by Ralph D. Hill, now United States Patent Number 6,005,600, and assigned to the assignee of the instant application. The instant application was filed on November 11, 1999.

The parent application, now US Pat. No. 6,005,600 ('600 patent), is directed to a system and method for enabling a user to view a moving picture
15 with synchronized audio using a workstation connected to a digital network that can provide digital data. For example, digitized movie data may be accessed from different sources (e.g., network servers, local disks). These sources typically vary in speed and response time as a result of their capabilities (e.g., limited I/O bandwidth) and transient events (e.g., resource contention). The
20 '600 patent is further directed to a system and method that can adapt to these varying conditions in order to maintain a stable output.

Issues Presented for Review

1. Were claims 1, 3-6, 14 and 16-19 properly rejected under 35
25 U.S.C. § 103(a) as being unpatentable over Langford et al. (U.S. Pat. No. 5,206,929) in view of DuLac et al. (U.S. Pat. No. 5,790,794)?

2. Were claims 2, 7-13 and 15 properly rejected under 35 U.S.C. § 103(a) as being unpatentable over Langford et al. (U.S. Pat. No. 5,206,929) in view of DuLac et al. (U.S. Pat. No. 5,790,794)?

Grouping of Claims

Applicant submits that claims 1-19 fall into two groups: Group I includes claims 1, 3-6, 14 and 16-19; and Group II includes claims 2, 7-13 and 15. Claim Groups I and II do not stand or fall together for at least the reasons presented below and for other reasons presented in the Arguments section.

Group I

Group I includes independent claims 1 and 14. Claim 1 is directed to a method while claim 14 is directed to computer readable medium. These independent claims recite a first media data clip stored across a data network within a first source and a second media data clip stored across the data network within a second source. Group I also includes claims 3-6, which depend on claim 1, and claims 16-19, which depend on claim 14. The claims of Group I do not recite a server.

Group II

Group II includes claims 2, 7-13 and 15. Independent claim 7 is directed to a system while claim 2 depends on independent claim 1, and claim 15 depends on independent claim 14. These claims recite a first server and a second server that couple to a data network. In claims 2 and 15, the first source comprises a first server coupled to the data network and the second source comprises a second server coupled to the data network. The claims of Group II recite a first server and a second server wherein the servers are coupled to a data network. The claims of Group I do not recite a first server and a second server. For at least these reasons, the Group II claims are separately patentable. Therefore, Applicant submits that the Group II claims cannot fall for the same reasons as Group I claims. Applicant submits that any rejection under 35 U.S.C. §103 of the Group II claims must rely on a reference that teaches or suggests at least the recited first and second servers, for example, operable in a frame accurate client pull model.

While Applicant has grouped claims 1-19 as presented above, Applicant does not make any admission that each of the claims 1-19 may not be argued in another forum as independently patentable and/or in other groupings.

5 **Argument**

Arguments are presented below in accordance with issues presented pertaining to claims of Groups I and II, which were rejected under 35 U.S.C. § 103(a).

Standard under 35 U.S.C. § 103(a)

10 The standard for rejection of claims under 35 U.S.C. § 103(a) is as follows and quoted directly from In re Lee, 277 F.3d 1338, 61 USPQ.2d 1430, 1433, 1434 (Fed. Cir. 2002):

15 As applied to the determination of patentability vel non when the issue is obviousness, "it is fundamental that rejections under 35 U.S.C. §103 must be based on evidence comprehended by the language of that section." In re Grasselli, 713 F.2d 731, 739, 218 USPQ 769, 775 (Fed. Cir. 1983).

* * *

20 When patentability turns on the question of obviousness, the search for and analysis of the prior art includes evidence relevant to the finding of whether there is a teaching, motivation, or suggestion to select and combine the references relied on as evidence of obviousness. See, e.g., McGinley v. Franklin Sports, Inc., 262 F.3d 1339, 1351-52, 60 USPQ2d 1001, 1008 (Fed. Cir. 2001) . . . "The factual inquiry whether to combine references must be thorough and searching." Id. It must be based on objective evidence of record. This precedent has been reinforced in myriad decisions, and cannot be dispensed with . . . In re Dembiczak, 175 F.3d 994, 999, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999) ("Our case law makes clear that the best defense against the subtle but powerful attraction of a hindsight-based obviousness analysis is rigorous application of the requirement for a showing of the teaching or motivation to combine prior art references.").

* * *

The need for specificity pervades this authority. See, e.g., In re Kotzab, 217 F.3d 1365, 1371, 55 USPQ2d 1313, 1317 (Fed. Cir.

2000) ("particular findings must be made as to the reason the skilled artisan, with no knowledge of the claimed invention, would have selected these components for combination in the manner claimed"); . . . In re Fritch, 972 F.2d 1260, 1265, 23 USPQ2d 1780, 1783 (Fed. Cir. 1992) (the examiner can satisfy the burden of showing obviousness of the combination "only by showing some objective teaching in the prior art or that knowledge generally available to one of ordinary skill in the art would lead that individual to combine the relevant teachings of the references").

In re Lee, 61 USPQ.2d at 1433, 1434. (Applicant reserves the right to rely on any of the cited authorities that appear within this particular quote taken from In re Lee.).

The Office has the burden under 35 U.S.C. § 103 to establish a prima facie case of obviousness. In re Fine, 837 F.2d 1071, 1074 (Fed. Cir. 1988). To meet this burden, the Office must consider a proper temporal perspective in an effort to avoid improper hindsight reconstruction. For example, In re Kotzab states:

A critical step in analyzing the patentability of claims pursuant to section 103(a) is casting the mind back to the time of invention, to consider the thinking of one of ordinary skill in the art, guided only by the prior art references and the then-accepted wisdom in the field. See Dembiczak, 175 F.3d at 999, 50 USPQ2d at 1617. Close adherence to this methodology is especially important in cases where the very ease with which the invention can be understood may prompt one "to fall victim to the insidious effect of a hindsight syndrome wherein that which only the invention taught is used against its teacher." Id. (quoting W.L. Gore & Assocs., Inc. v. Garlock, Inc., 721 F.2d 1540, 1553, 220 USPQ 303, 313 (Fed. Cir. 1983)).

In re Kotzab, 217 F.3d at 1371 (emphasis added).

A prima facie case of obviousness must comport with such applicable law. A further recitation of the Office's burden is set forth in the M.P.E.P., which states:

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or

motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

M.P.E.P. § 2142.

Arguments presented herein point to various aspects of the record to demonstrate that all of the criteria set forth for making a prima facie case have not been met.

Group I: Claims 1, 3-6, 14 and 16-19

Claims 1, 3-6, 14 and 16-19 were not properly rejected under 35 U.S.C. § 103(a) as being unpatentable over Langford et al. (U.S. Pat. No. 5,206,929) in view of DuLac et al. (U.S. Pat. No. 5,790,794). For at least the following reasons, Applicant respectfully submits that the Office erred in rejecting claims 1, 3-6, 14 and 16-19. More specifically, Applicant submits that the evidence relied upon by the Office does not support the rejections made under 35 U.S.C. § 103(a). Applicant also submits that the evidence presented herein and in the record supports non-obviousness of all claims.

Claims 1, 3-6, 14 and 16-19 recite:

accessing a playlist wherein said playlist specifies a first clip and a second clip to be played and wherein said first clip is stored within a first source and said second clip is stored within a second source;

translating said playlist into a first plurality of frame accurate requests that specify first respective frames of said first clip and a second plurality of frame accurate requests that specify second respective frames of said second clip;

transmitting said first plurality of frame accurate requests over
said data network to said first source;

transmitting said second plurality of frame accurate requests
over said data network to said second source;

5 receiving said first respective frames from said first source;

rendering said first respective frames at a predetermined
framerate;

before a last frame of said first respective frames is rendered,
receiving a first frame of said second respective frames from said
10 second source;

rendering said first frame of said second respective frames
after said last frame at said predetermined framerate such that
playback of said first clip and said second clip appears seamless.

15 Errors in the Rejection

Applicant asserts that the Office erred in rejecting claims 1, 3-6, 14 and
16-19. More specifically, the Office erred in rejecting claims 1, 3-6, 14 and 16-
19 under §103(a) over the Langford reference in view of the DuLac reference.

The claims 1, 3-6, 14 and 16-19 recite translating a playlist that includes
20 a first clip stored in a first source and a second clip stored in a second source
into a first and a second plurality of frame accurate requests, transmitting the
requests over a data network to the first source and the second source,
receiving frames from the first source, rendering the frames at a predetermined
framerate and receiving frames from the second source and rendering the
25 frames from the second source at the predetermined framerate for playback of
the two clips in a manner that appears seamless. Further, the subject matter of
claims 1, 3-6, 14 and 16-19 may be suitable for implementation in a "client pull"
manner. Applicant submits that for various reasons the Langford reference and
the DuLac reference do not teach or suggest the subject matter of claims 1, 3-6,

15 and 16-19; therefore, Applicant submits that these claims are patentable over the Langford and DuLac references.

Insufficient Evidence to Combine

5 a) *The Langford Reference's Video Signal*

The Langford reference pertains to a "post production offline editing system" (Abstract) that relies on a video switcher (see Fig. 2, item 46) to select a video signal from a bank of video tape or laser disk players (see Fig. 2, items 50) for display on a video display monitor (see Fig. 2, item 52b).

10 In the Office Action mailed April 7, 2004, the Office identifies the Langford reference's video tape or laser disk players as video sources of video clips, the off-line edit controller 30 as a receiver of video clips and the monitor 35 as a display for video clips. To accomplish such a task, the Langford reference discloses at col. 15, lines 18-30:

15 In one class of embodiments of the invention, video takes are displayed directly on monitor 35 within windows 441-446, rather than icons representing video takes elsewhere displayed. For example, this may be accomplished by connecting conventional picture-in-picture circuitry between recorders 50 and monitor 35.

20 The picture-in-picture video displays within windows 441-446 need not have high resolution, and may be significantly compressed. Of course, when picture-in-picture video takes are displayed within windows 441-446, video monitors 52a-52d may optionally be employed (as a redundant video display means) or omitted.

25 Thus, the Langford reference contemplates providing a video signal from the bank of video tape or laser disk players 50 directly to the monitor 35. Note that the Langford reference does not disclose, teach or suggest that the workstation 30 be included in this display loop. Consequently, the Office erred when it

30 stated that Langford reference discloses or teaches a "workstation for receiving

video clips". Instead, the Langford reference discloses and teaches a monitor to display a video signal from a video tape or disk player. The Langford reference simply does not teach playing media data stored over a data network – it teaches operation of a video tape or video disk player to send a video signal to a video monitor.

Applicant submits that for this reason alone, the rejection of claims 1, 3-6, 14 and 16-19 under §103(a) over the Langford reference in view of the DuLac reference is improper.

b) The Langford Reference's Rendering and Source

Applicant further submits that the Langford reference does not disclose a single rendering capability for the workstation 30. Instead, the Langford reference discloses and teaches rendering at the video tape or video disk players, i.e., the "source" identified by the Office. In contrast, the Langford reference identifies the tape or video disk as the source (col. 13, line 9), not the players 50, as transmitting requests to a tape or disk makes little sense. Consequently, the transmitting, receiving and rendering of claims 1, 3-6, 14 and 16-19 are not taught nor suggested by the Langford reference because the Langford reference is concerned with video signals and not media data stored over a data network. For at least this reason alone, Applicant submits that the Office erred in rejecting claims 1, 3-6, 14 and 16-19 under §103(a) over the Langford reference in view of the DuLac reference.

c) The DuLac Reference's Purpose

Applicant asserts that the Langford reference does not call out for technology of the DuLac reference. In particular, Applicant fails to find evidence in the Langford or DuLac reference that would be sufficient to motivate one of ordinary skill in the art to combine their respective teachings and arrive at the subject matter of claims 1, 3-6, 14 and 16-19.

The DuLac reference recognized that in 1995, “consumers also would like to have real-time interactive control of the VOD [video-on-demand] similar to video cassette recorder (VCR) type commands that presently available VCRs provide” (col. 1, lines 51-55). The DuLac reference identified such commands as “virtual VCR commands”—fast forwarding, pausing, or replaying portions of the video at will” (col. 1, lines 55-57). The DuLac reference aimed to set forth improved method and apparatus for delivering videos to users that overcome such problems (col. 2, lines 47-49).

Thus, in summary, the Langford reference pertains to edit control of video signals from video tape or disk players, the DuLac reference pertains to VCR type commands for VOD and the instant application pertains to playback of multiple clips from two sources in a manner that appears seamless. Consequently, given the problems addressed by the instant application and the subject matter of claims 1, 3-6, 14 and 16-19, Applicant fails to find evidence that would motivate someone to seek out the Langford and DuLac references. Thus, for this reason alone, Applicant submits that the Office erred in rejecting claims 1, 3-6, 14 and 16-19 under §103(a) over the Langford reference in view of the DuLac reference.

Insufficient Evidence as to a Reasonable Expectation of Success

Even if one of ordinary skill in the art considered the Langford and DuLac references, there is no evidence of record to indicate a reasonable expectation of success in arriving at the subject matter of claims 1, 3-6, 14 and 16-19. The Langford reference pertains to edit control of video signals from video tape or disk players, the DuLac reference pertains to VCR type commands for VOD and the instant application pertains to playing media data stored over a data network (in multiple sources) in a manner that appears seamless. For at least this reason alone, Applicant submits that the Office erred in rejecting claims 1, 3-6, 14 and 16-19 under §103(a) over the Langford reference in view of the DuLac reference.

Group II: Claims 2, 7-13 and 15

Claims 2, 7-13 and 15 were not properly rejected under 35 U.S.C. § 103(a) as being unpatentable over Langford et al. (U.S. Pat. No. 5,206,929) in view of DuLac et al. (U.S. Pat. No. 5,790,794). For at least the following
5 reasons, Applicant respectfully submits that the Office erred in rejecting claims 2, 7-13 and 15. More specifically, Applicant submits that the evidence relied upon by the Office does not support the rejections made under 35 U.S.C. § 103(a). Applicant also submits that the evidence presented herein and in the record supports non-obviousness of all claims.

10 Claims 2, 7-13 and 15 recite a first server and a second server. More specifically, in claims 7-13, the first server and second server are coupled to a data network, capable of receiving a plurality of frame accurate requests, capable of retrieving requested frames, and capable of transmitting retrieved frames to a client for subsequent rendering; and, in claims 2 and 15, the first
15 server and second servers are coupled to a data network, capable of receiving a plurality of frame accurate requests, and transmitting frames for subsequent rendering. Applicant asserts that the Langford reference and the DuLac reference do not teach or suggest the subject matter of claims 2, 7-13 and 15 and, consequently, that the claims 2, 7-13 and 15 are allowable over the
20 Langford reference in view of the DuLac reference.

Errors in the Rejection

Applicant asserts that the Office erred in rejecting claims 2, 7-13 and 15. More specifically, the Office erred in rejecting claims 2, 7-13 and 15 under
25 §103(a) over the Langford reference in view of the DuLac reference. The reasons set forth above for errors by the Office and patentability of claims 1, 3-6, 14 and 16-19 also apply to claims 2, 7-13 and 15. Applicant submits that for various reasons the Langford reference and the DuLac reference do not teach or suggest the subject matter of claims 2, 7-13 and 15; therefore, Applicant

submits that these claims are patentable over the Langford and DuLac references.

Insufficient Evidence to Combine

5 a) *The Langford Reference's Lack of a Server*

The Langford reference does not teach or suggest use of a server. The Langford reference relies on video tape or video disk players that transmit video signals to display devices; the Langford reference does not contemplate use of a device for transmission of digital media data for subsequent rendering. Yet
10 further, there is no evidence in the Langford reference to suggest replacement of any component with a server nor does the Langford reference mention a server. For this reason alone, Applicant submits that the rejection of claims 2, 7-13 and 15 is in error.

15 b) *The DuLac Reference's Purpose*

The DuLac reference is directed to video commands and, in particular, "virtual VCR commands" (col. 1, lines 55-57). The DuLac reference is not even tangentially related to playback of media data from two servers on a data network in a manner that appears seamless (claims 2, 7-13 and 15). Therefore,
20 Applicant submits that, given the subject matter of claims 2, 7-13 and 15, there is no evidence of record to support a motivation to combine the video editing system of the Langford reference and the virtual command system of the DuLac reference. For at least this reason, Applicant submits that the rejection of claims 2, 7-13 and 15 is in error.

25

Insufficient Evidence as to a Reasonable Expectation of Success

Even if evidence existed as to a motivation to combine the Langford and the DuLac references, Applicant finds no evidence that one of ordinary skill in the art would have a reasonable expectation of success in arriving at the
30 subject matter of claims 2, 7-13 and 15. In other words, given the system of the

Langford reference, there is no component or group of components of the DuLac reference that could be used to transform the system of the Langford reference to the subject matter of claims 2, 7-13 and 15. In essence, there is no evidence of record to teach or suggest the combination set forth in the Office's rejection of claims 2, 7-13 and 15. Yet further, even if the references disclosed every piece of equipment recited in claims 2, 7-13 and 15, the record lacks substantial evidence as to operational method or control logic. For at least these reasons, Applicant submits that the rejection of claims 2, 7-13 and 15 is in error.

Conclusion

It is respectfully submitted that the cited art does not render the claimed invention obvious and that therefore the claimed invention does patentably distinguish over the cited art. Further, various evidence of record supports non-obviousness of the subject matter of claims 1-19 (e.g., problems addressed by the Langford reference and the DuLac reference). It is respectfully submitted that claims 1-19, as set forth in Groups I and II, should therefore be allowed. The Office has not made a prima facie case of obviousness for any of these Groups. Reversal of the Office's rejections of claims 1-19 is respectfully requested.

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APPENDIX – PENDING CLAIMS

Claim 1 (Original). A method of playing media data stored over a data network comprising the steps of:

accessing a playlist wherein said playlist specifies a first clip and a
5 second clip to be played and wherein said first clip is stored within a first source
and said second clip is stored within a second source;

translating said playlist into a first plurality of frame accurate requests
that specify first respective frames of said first clip and a second plurality of
frame accurate requests that specify second respective frames of said second
10 clip;

transmitting said first plurality of frame accurate requests over said data
network to said first source; transmitting said second plurality of frame accurate
requests over said data network to said second source;

receiving said first respective frames from said first source;
15 rendering said first respective frames at a predetermined framerate;
before a last frame of said first respective frames is rendered, receiving a
first frame of said second respective frames from said second source;

rendering said first frame of said second respective frames after said last
frame at said predetermined framerate such that playback of said first clip and
20 said second clip appears seamless.

Claim 2 (Original). A method as recited in Claim 1 wherein said first source comprises a first server coupled to said data network and wherein said second source comprises a second server coupled to said network.

5 Claim 3 (Original). A method is recited in Claim 1 wherein said first plurality of frame accurate requests each specifies a respective one of said first respective frames.

Claim 4 (Original). A method is recited in Claim 3 wherein said second
10 plurality of frame accurate requests each specifies a respective one of said second respective frames.

Claim 5 (Original). A method as recited in Claim 1 wherein said predetermined framerate is adjustable by a user.
15

Claim 6 (Original). A method as recited in Claim 1 wherein said media data comprises audio data and video data.

Claim 7 (Previously amended). A system for playing media data stored over a
20 data network comprising:

a client computer coupled to said data network, wherein said client computer comprises:

a user interface for receiving a playlist from a user wherein said playlist specifies a first clip and a second clip to be played,

a playback engine for translating said playlist into a first plurality of frame accurate requests corresponding to said first clip and a second plurality

5 of frame accurate requests corresponding to said second clip;

a first server computer coupled to receive said first plurality of frame accurate requests from said client computer via said data network, wherein said server computer retrieves first respective frames of said first clip requested by said first plurality of frame accurate requests and transmits said first

10 respective frames to said client computer;

a second server computer coupled to receive said second plurality of frame accurate requests from said client computer via said data network wherein second server computer retrieves second respective frames of said second clip requested by said second plurality of frame accurate requests, and

15 transmits said second respective frames to said client computer;

wherein said client computer renders said first respective frames and said second respective frames at a predetermined framerate such that playback of said first clip and said second clip appears seamless.

20 Claim 8 (Original). A system as recited in Claim 7 wherein said first server comprises a first data storage for storing said first clip and wherein said second server comprises a second data storage for storing said second clip.

Claim 9 (Original). A system as recited in Claim 7 wherein said user interface allows a user to specify a beginning frame and an ending frame of a clip to be played.

5 Claim 10 (Original). A system as recited in Claim 7 wherein said first plurality of frame accurate requests each specifies a respective one of said first plurality of frames.

Claim 11 (Previously amended). A system as recited in Claim 7 wherein said
10 second plurality of frame accurate requests each specifies a respective one of said second plurality of frames.

Claim 12 (Original). A system as recited in Claim 7 wherein said predetermined framerate is adjustable by a user.

15

Claim 13 (Original). A system as recited in Claim 7 wherein said media data comprises audio data and video data.

Claim 14 (Original). A computer readable medium containing therein computer
20 readable codes for causing a computer system to perform a step of playing media data stored across a data network, the method comprising the steps of:

accessing a playlist wherein said playlist specifies a first clip and a second clip to be played and wherein said first clip is stored within a first source and said second clip is stored within a second source;

translating said playlist into a first plurality of frame accurate requests
5 that specify first respective frames of said first clip and a second plurality of frame accurate requests that specify second respective frames of said second clip; transmitting said first plurality of frame accurate requests over said data network to said first source;

transmitting said second plurality of frame accurate requests over said
10 data network to said second source; receiving said first respective frames from said first source;

rendering said first respective frames at a predetermined framerate;

before a last frame of said first respective frames is rendered, receiving a first frame of said second respective frames from said second source;

15 rendering said first frame of said second respective frames after said last frame at said predetermined framerate such that playback of said first clip and said second clip appears seamless.

Claim 15 (Original). A computer readable medium as recited in Claim 14
20 wherein said first source comprises a first server coupled to said data network and wherein said second source comprises a second server coupled to said network.

Claim 16 (Original). A computer readable medium is recited in Claim 14 wherein said first plurality of frame accurate requests each specifies a respective one of said first respective frames.

- 5 Claim 17 (Original). A computer readable medium is recited in Claim 16 wherein said second plurality of frame accurate requests each specifies a respective one of said second respective frames.

- 10 Claim 18 (Original). A computer readable medium as recited in Claim 14 wherein said predetermined framerate is adjustable by a user.

Claim 19 (Original). A computer readable medium as recited in Claim 14 wherein said media data comprises audio data and video data.